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U.S. EQUAL EMPLOYMENT
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

vs.

LUCINDA MANAGEMENT, LLC,
CENTENNIAL FOOD CORPORATION dba
IHOP RESTAURANT, NELLIS FOOD
CORPORATION dba IHOP RESTAURANT,
VEGAS FOOD CORPORATION dba IHOP
RESTAURANT, CHEYENNE FOOD
CORPORATION dba IHOP RESTAURANT,
CRAIG FOOD CORPORATION dba IHOP
RESTAURANT, BAYSHORE FOOD
CORPORATION dba IHOP RESTAURANT,
DiHOP CORPORATION dba IHOP
RESTAURANT, COOPER STREET CLAM &
OYSTER BAR, LLC, and Does 1-5 Inclusive,

Defendant.

Case No.: 2:17-cv-02458-MMD-GWF

**JOINT STIPULATION TO MODIFY THE
TERMS OF THE CONSENT DECREE**

1 **TO THE HONORABLE MIRANDA M. DU:**

2 Plaintiff U.S. Equal Employment Opportunity Commission (the “EEOC” or
3 “Commission”) and Defendants Lucinda Management, LLC, Centennial Food Corporation dba
4 IHOP Restaurant, Nellis Food Corporation dba IHOP Restaurant, Cheyenne Food Corporation
5 dba IHOP Restaurant, Craig Food Corporation dba IHOP Restaurant, Bayshore Food
6 Corporation dba IHOP Restaurant, DiHOP Corporation dba IHOP Restaurant, and Cooper
7 Street Clam & Oyster Bar, LLC (“Defendants”)(collectively, the “Parties”) hereby jointly
8 stipulate to modify the deadlines in Sections X.A and X.H of the Consent Decree in the above-
9 captioned case from March 19, 2019 to April 9, 2019.

10 Pursuant to Section VI.A of the Consent Decree, signed by this Court on February 19,
11 2019, terms of the Consent Decree may be amended or modified if made in writing, signed by
12 an authorized representative of the Parties, and approved by the Court. Section X.A of the
13 Decree requires Defendants to retain an Equal Employment Monitor (“Monitor”) within thirty
14 (30) days of the Effective Date, which is March 19, 2019. Defendants are in the process of
15 retaining a Monitor, but require additional time to finalize the arrangement. Section X.H
16 requires Defendants to establish and disseminate a Toll-Free Hotline within thirty (30) days of
17 the Effective Date, which is March 19, 2019. Defendants have encountered difficulties finding
18 a vendor to establish the Hotline. Therefore, the Parties agree that additional time is required
19 for Defendants to come into full compliance Section X.A and X.H of the Consent Decree.

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As such, the Parties stipulate and respectfully request that the deadlines in Section X.A and X.H of the Consent Decree be extended until April 9, 2019.

IT IS SO STIPULATED.

Dated: March 26, 2019

Dated: March 26, 2019

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER, LLP.

/s/ Nechole Garcia
Nechole Garcia
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Attorney for Plaintiff

/s/ Richard Dreitzer
Richard I. Dreitzer, Esq.
Nevada Bar No. 6626
James T. Tucker, Esq.
Nevada Bar No. 12507
300 South Fourth Street, Eleventh Floor
Las Vegas, NV 89101
Attorney for Defendants

PROPOSED ORDER

IT IS SO ORDERED.

DATED: 3/27/2019



THE HONORABLE MIRANDA M. DU,
UNITED STATES DISTRICT JUDGE

1 I am, and was at the time the herein mentioned mailing took place, a citizen of the
2 United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

3 I am employed in the Legal Unit of the Los Angeles District Office of the United States
4 Equal Employment Opportunity Commission.

5 My business address is U.S. Equal Employment Opportunity Commission, Las Vegas
6 Local Office, 333 Las Vegas Boulevard South, Ste 5560, Las Vegas, NV 89101.
7

8 On the date that this declaration was executed, as shown below, I served the foregoing
9 **JOINT STIPULATION TO MODIFY THE TERMS OF THE CONSET DECREE** via the
10 Case Management/Electronic Case Filing (CM/ECF) system to:
11

12 Richard I. Dreitzer, Esq.
13 Nevada Bar No. 6626
14 James T. Tucker, Esq.
15 Nevada Bar No. 12507
16 Wilson, Elser, Moskowitz, Edelman & Dicker, LLP
17 300 South Fourth Street, Eleventh Floor
18 Las Vegas, NV 89101
19 (702)727-1400
20 Richard.dreitzer@wilsonelser.com
21 James.tucker@wilsonelser.com
22

23 I declare under penalty of perjury that the foregoing is true and correct.
24 Executed on March 26, 2019, at Las Vegas, NV.
25

26 /s/ Nechole Garcia
27 NECHOLE GARCIA
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